

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

KAYLA CHLUDZINSKI,

Plaintiff,

Case No.:

v.

RADIUS GLOBAL SOLUTIONS, LLC,

Defendants.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Radius Global Solutions, LLC (“RGS”), by its attorney, hereby removes this action from the Lackawanna County Court of Common Pleas, State of Pennsylvania, to the United States District Court for the Middle District of Pennsylvania. In support of this Notice of Removal, Defendant states as follows:

1. On November 1, 2021, Plaintiff Kayla Chludzinski commenced this action by filing a Praecipe for Writ of Summons against Defendant in the Lackawanna County Court of Common Pleas, State of Pennsylvania, where it is presently captioned as *Kayla Chludzinski v. Radius Global Solutions, LLC*, Docket No.: 21-cv-4675.
2. On March 22, 2022, Plaintiff filed a Praecipe to Reinstate Summons.
3. On May 20, 2022, Plaintiff filed her Complaint. A true and correct copy of the State Court record is attached hereto as Ex. “A.”
4. On or about June 3, 2022, Defendant was served with the Complaint.

5. In the Complaint, Plaintiff asserts Defendant violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

6. This Court has jurisdiction over Plaintiff's claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claim is founded upon a claim or right arising under the laws of the United States.

7. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which Defendant was served with Plaintiff's Complaint. See 28 U.S.C. § 1446.

8. Written notice of this Notice of Removal of this action is being immediately provided to Lackawanna County Court of Common Pleas, State of Pennsylvania. See Exh. "B."

WHEREFORE, Defendant Radius Global Solutions, LLC gives notice that this action is removed from the Lackawanna County Court of Common Pleas, State of Pennsylvania, to the United States District Court for the Middle District of Pennsylvania.

Dated: June 29, 2022

Respectfully submitted

/s/ Aaron R. Easley
Aaron R. Easley, Esq. (#73683)
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Attorney for Defendant,
Radius Global Solutions, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2022, a copy of the foregoing was filed electronically in the ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system and was served via U.S. Mail upon the following:

Brett M. Freeman, Esq.
Sabatini Freeman, LLC
216 North Blakely Street
Dunmore, PA 18512
Attorneys for Plaintiff

By: /s/ Aaron R. Easley
Attorney for Defendant,
Radius Global Solutions, LLC